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Attorney for Defendant
VANESSA SHORT

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,) No. CR 08-0251 MMC
Plaintiff,)
v.) EX PARTE APPLICATION FOR ORDER
) PERMITTING TRAVEL, SUBMITTED
VANESSA SHORT,) WITH THE APPROVAL OF THE AUSA AND
Defendant.) PRETRIAL SERVICES; DECLARATION OF
) COUNSEL

Defendant Vanessa Short, through counsel, applies for permission to travel to and from the following locations on the following dates:

- Las Vegas, NV from May 21-23, 2008
- Los Angeles, CA from May 28-30, 2008

This application is submitted after consultation with the AUSA and the supervising Pretrial Services Officer, both of whom have informed counsel that they have no objection to this request.

This Application is based on the attached *Declaration Of Counsel*. A proposed order accompanies this application.

Dated: May 2, 2008

Respectfully submitted,

/S/

Mark R. Vermeulen
Attorney for Defendant
VANESSA SHORT

DECLARATION OF COUNSEL

I, Mark R. Vermeulen, declare:

1. I am an attorney duly admitted to practice before this Court and I represent Defendant Vanessa Short in this action.

2. I request that Ms. Short be permitted to travel to and from Las Vegas, NV from May 21-23, 2008, to spend time with a friend. I also request that she be permitted to travel to and from Los Angeles, CA from May 28-30, 2008, to attend worker's compensation proceedings in which she's involved. Ms. Short had planned and scheduled both of these trips before she was arrested on this matter earlier this month.

3. I have communicated with AUSA Derek Owens and with Pretrial Services Officer Paul Mamaril, who is assigned to this case, and each of them has informed me that he has no objection to this request.

4. I will email a copy of this *Application* and the accompanying [*Proposed*] *Order Permitting Travel* to Pretrial Services Officer Paul Mamaril on the same date I file this via ECF, and a copy of each will be provided to AUSA Derek Owens automatically via ECF filing.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on May 2, 2008 at San Francisco, CA.

/s/ _____
Mark R. Vermeulen